

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS
BID PROTEST**

AMAZON WEB SERVICES, INC.,

Plaintiff,

v.

UNITED STATES OF AMERICA,
by and through the U.S. Department of Defense,

Defendant.

Case No. 19-1796 C

Judge _____

PLAINTIFF'S MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Paragraph 4 of Appendix C to the Rules of the United States Court of Federal Claims, Plaintiff Amazon Web Services, Inc. (“AWS”) moves for leave to file its Complaint and related filings, including AWS’s motion to supplement the administrative record, under seal. AWS will file proposed redacted versions of these filings with the Court.

The Complaint and related filings contain source selection sensitive information, as well as AWS’s proprietary information, trade secrets, and confidential financial information, the release of which would cause severe competitive harm. The record in this bid protest likely will contain similarly sensitive information. Accordingly, AWS respectfully requests the Court GRANT this Motion.

Dated: November 22, 2019

Respectfully submitted,

By:



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